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Environment and Natural Resources Division

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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT CALIFORNIA
WESTERN DIVISION**

)
CENTER FOR BIOLOGICAL)
DIVERSITY; WISHTOYO)
FOUNDATION,) Case No. 2:24-cv-05459-MWC-MAA
)
Plaintiff,)
v.)
DOUG BURGUM, et al.,)
)
Federal Defendants,)
)
SABLE OFFSHORE CORP.,)
)
Intervenor-Defendants.)
)

1. My name is Bobby Kurtz and since April 21, 2025, I serve as the Acting Director for Pacific Outer Continental Shelf Region (POCSR) with the Bureau of Safety and Environmental Enforcement (BSEE). I have been

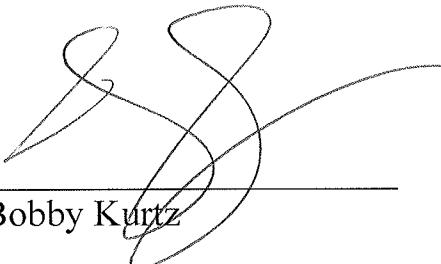
employed with BSEE POCSR since January 2012, serving as a geophysicist until being selected as Chief of the Reservoir Development Section in February 2014, and subsequently as Regional Supervisor of the Office of Production and Development in May 2019. Prior to my employment with the BSEE POCSR, I was employed by the then-Minerals Management Service in the Gulf of America Region as a geologist from October 2007-April 2010 and the Bureau of Ocean Energy Management from May 2010-December 2011.

2. In a prior declaration submitted to the court on December 20, 2024, Doc. 37-1, my predecessor, Bruce Hesson, stated that “before returning to production, Sable must first satisfy several conditions.” As one of those conditions, he stated that “the California State Fire Marshall Office’s Pipeline Division must inform BSEE that Sable is approved to operate the onshore pipeline segments 901-903, which have been inoperable since 2015.”
3. Since Mr. Hesson’s December 20, 2024, declaration, BSEE has decided that notification of approval by the California State Fire Marshall Office’s Pipeline Division is no longer necessary to restart production. Furthermore, Sable has repaired all pipeline anomalies within Lines CA-324 and CA-325 (formerly Lines 901 and 903) and has conducted hydrotesting to assure pipeline integrity. While I understand that the California State Fire Marshal

Office's Pipeline Division still needs to review the hydrotest report, the restart plans, and other documentation submitted by Sable before giving its full approval for those segments of the onshore pipeline operations, BSEE considers those pipelines now as a viable option for evacuating crude oil from the onshore Las Flores Canyon facility in the unlikely event of an emergency. Accordingly, as a discretionary matter in my role as Acting Regional Director for the BSEE POCSR, I do not believe a shut-in of operations or production to ensure safety is currently warranted.

4. Further, it is my understanding that Sable is now producing to onshore storage tanks at the Las Flores Canyon facility, but that it is not currently producing to Lines CA-324 and CA-325.
5. I swear under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing information is true, accurate, and complete.

Executed this 30th day of May 2025.



Bobby Kurtz

A handwritten signature in black ink, appearing to read "Bobby Kurtz". The signature is fluid and cursive, with a large, stylized 'B' at the beginning. It is positioned above a solid horizontal line.